



January 23, 2006

Chair Philip Isenberg and
Members of the MLPA Blue Ribbon Task Force
c/o California Resources Agency
1416 9th Street #1311
Sacramento, CA 95814

Re: Central Coast MPA Packages

Dear Chairman Isenberg and MLPA Blue Ribbon Task Force,

On behalf of Defenders of Wildlife (“Defenders”), a nationally recognized conservation group representing nearly a half million members and supporters nationwide, and more than one quarter of that in California, I’m submitting the following comments on the proposed MPA (Marine Protected Areas) packages for the Central Coast.

The primary goal of Defenders mission is to focus our programs on what scientists consider two of the most serious environmental threats to the planet: the accelerating rate of extinction of species and the associated loss of biological diversity, and habitat alteration and destruction. Our programs encourage protection of entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. This coincides with the primary goal of the Marine Life Protection Program established pursuant to the Marine Life Protection Act (MLPA), which is to “protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems” (Fish and Game Code §2583(b)(1)). MPAs strike a balance - restoring marine life while leaving most of our coastal waters open. Fully protected marine reserves are the cornerstone for an effective network of MPAs.

We urge you to adopt Package AC, and at the very minimum Package 2. While Package 2 is a balanced approach to marine protection that improves existing protection, focuses on key areas such as Point Lobos, Point Sur and Piedras Blancas, and is fair to the fishing community by leaving most of the coast open to fishing, the protections afforded through Package AC is warranted. Specifically, Defenders supports significant (big) marine reserves at Año Nuevo, Point Sur, the Big Sur coast, Piedras Blancas, Point Buchon, and expansion of Point Lobos State Marine Reserve (to include the head of Carmel Canyon).

At times, during the MLPA process, it appears that the science supporting the designation of MPAs has been unfairly called into question. Many things shift the direction of scientific inquiry and findings are ever evolving. There is a preponderance of scientific evidence available indicating the utility of MPAs

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and the critical need for them as one of the tools in our toolbox, while certainly not the only tool. Science is never perfect and new research and investigations are ongoing. But, at any juncture in using science to support changes in policy, we must use the best available science, and Defenders' believes that this is what the Scientific Advisory Committee and the supporters of packages AC and 2 are doing.

Defenders strongly believes in using the precautionary principle and that it is critical that the MLPA process adheres to this principle. The California Condor is an example where this principle was not invoked. Before the agencies responsible for overseeing the recovery of the California Condor could act, the condor situation was already at a crisis level and urgent measures, such as captive breeding, were required to assist in the recovery of this small, vulnerable species. Regional Stakeholder Group members involved in developing these packages have worked hard to incorporate the concerns and interests from as many stakeholders as possible. It is important that we don't end up with a weaker proposal that doesn't provide the adequate marine protection required under the law and further compromises marine conservation in attempts to incorporate the variety of perspectives. We must err on the side of caution!

Thank you for your time and your hard work during this very difficult phase of the MLPA Initiative.

Sincerely,

A handwritten signature in black ink that reads "Jim Curland". The signature is fluid and cursive, with the first name "Jim" and last name "Curland" clearly distinguishable.

Jim Curland, Marine Program Associate

Defenders of Wildlife

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Moss Landing, CA. 95039

Cc: Governor Arnold Schwarzenegger